

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CRIMINAL NO. 15-4268 KG
	)	
vs.	)	
	)	
ANGEL DELEON, et al.,	)	
	)	
Defendants.	)	

**UNITED STATES' MOTION FOR EXTENSION OF TIME**  
**TO APPOINT LEARNED COUNSEL**

The United States of America hereby files this motion to extend time to appoint learned counsel.

1. On December 1, 2015, a federal grand jury in the District of New Mexico returned the indictment in this case against the following defendants: **JOE GALLEGOS, EDWARD TROUP, a.k.a. "Huero Troup," LEONARD LUJAN, BILLY GARCIA, a.k.a. "Wild Bill," EUGENE MARTINEZ, a.k.a. "Little Guero," ALLEN PATTERSON, CHRISTOPHER CHAVEZ, a.k.a. "Critter," JAVIER ALONSO, a.k.a. "Wineo," BENJAMIN CLARK, a.k.a. "Cyclone," RUBEN HERNANDEZ, JERRY ARMENTA, a.k.a. "Creeper," JERRY MONTOYA, a.k.a. "Boxer," MARIO RODRIGUEZ, a.k.a. "Blue," TIMOTHY MARTINEZ, a.k.a. "Red," ANTHONY RAY BACA, a.k.a. "Pup," MAURICIO VARELA, a.k.a. "Archie," a.k.a. "Hog Nuts," and DANIEL SANCHEZ, a.k.a. "Dan Dan."**

2. In the indictment, the aforementioned defendants are facing charges which make them death penalty eligible.

3. The United States is seeking an expedited capital case review and decision as to the death penalty.

4. Consequently, learned counsel will not be necessary unless the Attorney General recommends that the United States seeks death as to any of these defendants.

WHEREFORE, the United States respectfully requests that the Court extend the time to appoint learned counsel for forty-five days.

Respectfully submitted,

DAMON P. MARTINEZ  
United States Attorney

**Electronically Filed 12/4/2015**  
MARIA Y. ARMIJO  
RANDY M. CASTELLANO  
Assistant United States Attorneys  
555 S. Telshor, Ste. 300  
Las Cruces, NM 88011  
(575) 522-2304 - Tel.